CINCINNATI CLEVELAND COLUMBUS DAYTON NEW YORK WASHINGTON, D.C.

October 19, 2004

Honorable Kenneth M. Karas United States District Judge Southern District of New York United States Court House 500 Pearl Street New York, New York 10007

RE: Roach v. Young & Rubicam, 02 CV 10111 (KMK)(NRB)

Dear Judge Karas:

I write on behalf of Jeffrey C. Slade, Esq., the attorney for Jerry Roach, plaintiff in the abovecaptioned action. Mr. Slade and I have been close friends since we attended law school together 29 years ago.

As of September 30, 2004, Mr. Slade is totally disabled and must withdraw from representing all of his clients, including the plaintiff in this case. Having suffered a severe major depression episode resulting in a four-day period of hospitalization, Mr. Slade will be under the care and supervision of a physician and other health professionals for an indefinite period. Mr. Slade has told me that he intends to, and must immediately, close down his practice. At the very least, his illness will result in his practice being suspended for a period of six months to one year; it is possible that, even after one year, Mr. Slade will close down his practice permanently.

Along with another attorney, I am representing Mr. Slade to effect his withdrawal as counsel in all of his pending cases, including this one. Mr. Slade is essentially a solo practitioner. He engages attorneys to assist him on a case-by-case and hourly rate basis, as the need for such assistance arises. He has worked essentially solo on this case.

I have spoken to Mr. Roach about retaining a new attorney and I am hopeful that he can obtain new counsel in the near future. I am not available to serve as plaintiff's counsel and I write solely as Mr. Slade's attorney. If Mr. Roach is unable to secure new counsel to whom his case can be transferred. I will file a motion for leave to withdraw on Mr. Slade's behalf.

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In light of the unfortunate circumstances related in this letter, I respectfully request that all proceedings in this case be stayed until such time as Mr. Roach retains new counsel or, at the very least, until he is given a reasonable time to retain new counsel.

Respectfully submitted,

/s/ Norman A. Bloch

Norman A. Bloch (NB-7971)

cc: Jerry Roach Plaintiff

> Raphael Lee, Esq. Attorney for Defendant Davis & Gilbert LLP 1740 Broadway New York, New York 10019

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